

Best Practices for Building an Effective Compliance Training Program

By Aletheia Lawry, Bay Area Regional Medical Center, Houston, TX

To be compelling and effective, compliance training should encompass more than just the appropriate content. Factors to consider are determining the format of training, such as electronic vs. in-person training; creating scenarios to engage your audience; and gaining buy-in from your leadership team so they will support and help promote your program. Here are some best practices compliance officers may want to consider when building their compliance training programs:

- **Determine Your Audience Segments.** Divide the organization into categories based on functions and relationships to the organization: employees, board members, medical staff, and vendors. Employees can be sub-divided into executive leaders, directors, and managers and non-managers. Also, medical staff leaders and medical staff members may need training that differs from other audience segments. As your compliance program grows, you may need to identify additional audience segments for training purposes. One approach is to divide the workforce based on job code classifications—billing, coding, medical records, emergency department, business development, physician relations, and so on.
- **Depth vs. Breadth.** Some audiences may need a high level overview of a topic, such as basic Emergency Medical Treatment and Labor Act (EMTALA) training for all employees. More in depth EMTALA training for Emergency Department employees might describe in detail what an appropriate medical screening exam entails and when it occurs.
- **Understand Your Audience.** The workforce today is diverse. There are generational differences in learning styles—Millennials want to see technology enabled learning; Baby Boomers may prefer group interactions; Generation X wants to know why the training is relevant to them. Engage experts to help design the training plan and modify the content and methods of delivery to address these generational differences. Organizational Development or Training departments are great resources.
- **Determine Frequency.** Some topics may require annual training, while others may only need to be covered at orientation. Consider training on critical topics annually while communicating a refresher message every six months. This refresher training might be as simple as an email or newsletter article that highlights a real word scenario to reinforce the training previously provided.
- **Focus on Repetition.** When we think of a training plan, we tend to think solely of required courses rolled out to employees through online learning platforms or in person programs, but an effective training plan encompasses so much more. Find ways to build repetition of the core messages into different formats such as an online course, the inclusion of a compliance slide in clinical training, newsletter articles, or a CEO story during a town hall.
- **Value Variety.** Plan a mix of training modalities—online, print, in person. Not only does this provide opportunities for repetition of key content, it also helps ensure the message is delivered in formats accessible to all types of learners.
- **Be Innovative.** Consider podcasts, screen savers with compliance tips, and online or web-based learning that incorporates gaming elements.
- **Tailor Your Online Courses.** Allow learners to choose their role or department and have the teaching scenarios reflect their choice. If a learner chooses a business office role, a training on Stark might present a scenario about an administrator requesting a high dollar check for a physician for which you have no contract on file. If the learner chooses a business development role, the Stark scenario might focus on a physician asking for use of the facility's box seats to a professional sporting event.
- **Integrate Your Training.** When developing your compliance training plan, include other leaders. The most effective compliance training will be the one that is built into the very fabric of the organization. Engaging leadership outside the compliance department will help you develop a plan that focuses on the learning objectives rather than simply checking the box that a training requirement has been fulfilled.

Effective compliance training is an ongoing activity that supports the overall compliance program. Significant time should be spent up front to design a comprehensive program tailored to the needs of your organization. Once developed, your training program should be continually revised and updated to reflect changes in the law and government enforcement activities.

About the Author



Aletheia Lawry (alawry@barmc.us) is General Counsel and Vice President, Physician Operations at Bay Area Regional Medical Center and President of Texas Gulf Coast Medical System. She has spent her career in house advising on legal and compliance matters for hospitals, physician organizations, and health systems.